

# **EXHIBIT 1**

**From:** [James Allen](#)  
**To:** [Daniel D. Quick](#)  
**Cc:** [Peter Doyle](#)  
**Subject:** RE: Worrell  
**Date:** Friday, May 30, 2025 10:58:14 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image005.png](#)

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I am not in a position to advise you on what you need to do or not do. We have said we will pay the experts. To my recollection, you have not made a similar commitment as it relates to Mr. Elliott and I am unaware of any payment advanced to him by you. As to timing, we can pay just as soon as our client advances the funds as we have no intention of violating MRPC 1.8. Perhaps we could facilitate the payment if Plaintiff stipulates to release funds currently being embargoed by the record companies. Beyond that,

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**From:** Daniel D. Quick <[DQuick@dickinson-wright.com](mailto:DQuick@dickinson-wright.com)>  
**Sent:** Thursday, May 29, 2025 12:52 PM  
**To:** James Allen <[james.allen@sbdetroit.com](mailto:james.allen@sbdetroit.com)>  
**Cc:** Peter Doyle <[Peter.Doyle@sbdetroit.com](mailto:Peter.Doyle@sbdetroit.com)>  
**Subject:** RE: Worrell

Do I need to bring this to the attention of the court? The experts need to get paid. Please advise this week.



**[Daniel D. Quick](#)**

Member

O:[248-433-7242](tel:248-433-7242)

[DQuick@dickinsonwright.com](mailto:DQuick@dickinsonwright.com)

2600 West Big Beaver, Suite 300, Troy, MI 48084

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**From:** Daniel D. Quick  
**Sent:** Tuesday, May 6, 2025 2:06 PM  
**To:** James Allen <[james.allen@sbdetroit.com](mailto:james.allen@sbdetroit.com)>  
**Cc:** Peter Doyle <[Peter.Doyle@sbdetroit.com](mailto:Peter.Doyle@sbdetroit.com)>  
**Subject:** RE: Worrell

Please advise on this.

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**From:** James Allen <[james.allen@sbdetroit.com](mailto:james.allen@sbdetroit.com)>  
**Sent:** Thursday, April 24, 2025 4:47 PM  
**To:** Daniel D. Quick <[DQuick@dickinson-wright.com](mailto:DQuick@dickinson-wright.com)>

**Cc:** Peter Doyle <[Peter.Doyle@sbdetroit.com](mailto:Peter.Doyle@sbdetroit.com)>

**Subject:** Re: Worrell

Yes we will pay. I need to check with Tom Bruetsch and the client on timing and will advise of expected date of payment next week.

Sent from my iPhone

On Apr 24, 2025, at 4:29 PM, Daniel D. Quick <[DQuick@dickinson-wright.com](mailto:DQuick@dickinson-wright.com)> wrote:

Counsel:

Are you prepared to pay the experts for the depositions? To our knowledge, you have not yet done that. If you confirm it will be done and when, we will commit to the same for defendants' expert. Please advise.



**Daniel D. Quick**

Member

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